

**Regional Water Quality Control Board
North Coast Region
Executive Officer's Summary Report
April 15, 2021**

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SUBJECT: Public Hearing on Order No. R1-2021-0005 to consider adoption of proposed Waste Discharge Requirements for Mendocino County Water Works District No. 2, Anchor Bay Wastewater Treatment Facility, WDID No. 1B83118OMEN, NPDES No. CA0024040 (Cathleen Goodwin)

BOARD ACTION: The Board will consider adoption of Waste Discharge Requirements Order No. R1-2021-0005. The Order will serve as a National Pollutant Discharge Elimination System (NPDES) permit for a period of five years.

BACKGROUND: The Mendocino County Water Works District No. 2 (Permittee) owns and operates the Anchor Bay Wastewater Treatment Facility (Facility), a domestic wastewater treatment plant that treats domestic and commercial wastewater from the unincorporated community of Anchor Bay with a population of approximately 100, including 68 residences, the Anchor Bay Campground, and a small commercial business district.

The Facility has an average dry weather design treatment capacity of 24,000 gallons per day (gpd) but is only permitted to discharge up to 19,600 gpd as a monthly average based on a request from the California Department of Fish and Wildlife (CDFW) in 1992 to mitigate CDFW's concern regarding potential impacts to marine communities near the discharge point.

Treatment processes at the Anchor Bay Facility consist of headworks with a bar screen, a 320,000-gallon aerated pond, a 300,000-gallon settling pond, a chlorine contact chamber for disinfection, and dechlorination facilities. Treated and disinfected wastewater is discharged either to the Pacific Ocean, after dechlorination, or used to irrigate 3.3 acres of forest land. Discharge to the Pacific Ocean is located within a sea cave, which provides a minimum initial dilution of 35:1. Discharge to the Pacific Ocean occurs intermittently, approximately 120 days per year, primarily from October through April for a duration of approximately 3 hours per discharge and an average flow rate of 12,000 gpd.

During the summer and other periods of dry weather, disinfected wastewater is used to irrigate two forested irrigation zones. The maximum estimated irrigation capacity of the land disposal system is 10,000 gpd. The forest irrigation area, which is on the Permittee's property and is not easily accessible by the public, is a land disposal area rather than water recycling application area because forested land is not an identified use in the State's Title 22 Water Recycling Criteria, nor does it have an agronomic

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water demand that can be met by water recycling. The volumes of water applied are relatively low and pose a low risk to water quality.

DISCUSSION: Order No. R1-2021-0005, as proposed, continues to prescribe technology-based effluent limitations for biochemical oxygen demand (BOD) and total suspended solids (TSS), and effluent limitations for total coliform bacteria, oil and grease, settleable solids, turbidity, pH, and total residual chlorine based on the Ocean Plan for discharges to the Pacific Ocean. The proposed Order also retains land discharge specifications for BOD, TSS, pH, and total coliform bacteria and narrative land discharge requirements to ensure that land applied effluent meets all requirements of the Order, including requirements to properly operate and maintain irrigation infrastructure to minimize the potential for runoff or overspray, prevent nuisance conditions (odors and vectors), and to protect groundwater.

The proposed Order includes new effluent monitoring and reporting requirements for copper and zinc. The Permittee submitted monitoring data for copper and zinc right before the Draft Permit was released for public comment, thus these monitoring requirements were not in the Draft Permit but have been added to the Proposed Permit. Reasonable potential to cause or contribute to an exceedance of water quality criteria for copper or zinc could not be determined, because only one sample result was available for each parameter, and these single sample results exceeded the Ocean Plan six month median water quality criteria for copper and zinc of 3 µg/L and 20 µg/L, respectively. Since these single sample results were below the daily maximum and instantaneous maximum water quality objectives, the reasonable potential analysis determined that additional monitoring data is necessary to conduct a complete and conclusive analysis in accordance with the Ocean Plan.

Mendocino County Water Works District No. 2 staff submitted one comment on the draft permit requesting that the monitoring frequency for total coliform bacteria for land disposal at Monitoring Location LND-001 be kept at monthly rather than being increased to weekly. The Draft Permit that was released for public comment included a weekly monitoring frequency because the Permittee reported occasional exceedances of the total coliform bacteria effluent limitation. The Permittee is concerned about the added cost of shipping weekly samples to the analytical laboratory due to the remote location of this Facility. Based on this comment, Regional Water Board staff recommend requiring a monthly monitoring frequency for total coliform bacteria (to match the monitoring frequency in the current order, Order No. R1-2016-0006) and to add an accelerated monitoring requirement to the Proposed Permit requiring additional sampling if a total coliform bacteria monitoring result exceeds the total coliform bacteria effluent limitations in Order section 4.2.1.2 of the Proposed Permit. This change has the result of reducing the Permittee's cost of monitoring for total coliform bacteria, provided that the effluent consistently meets effluent limitations. In addition, the Proposed Permit has been modified to emphasize the requirement for the Permittee to investigate the cause of any effluent limitation exceedance and identify and implement corrective actions to prevent future exceedances, as further discussed in the Response to Comments document.

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U.S. EPA staff also requested minor changes to Attachment D, Standard Provisions, of the Draft Permit as reflected in the Proposed Permit.

The attached Response to Comments documents summarizes all changes that have been made in the Proposed Permit.

Staff notified the Permittee of the proposed changes to the Proposed Permit. The Permittee's email reply to Staff indicated that Staff's response to the Permittee's comment and changes to the Proposed Permit are acceptable to the Permittee. Staff anticipates that the Proposed Permit will be uncontested.

RECOMMENDATION: Adopt Order No. R1-2021-0005, as proposed.

SUPPORTING DOCUMENTS:

1. Proposed Order R1-2021-0005
2. Notice of Public Hearing
3. Response to Comments
4. Comment Email from Anchor Bay (January 27, 2021)

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